

April 4, 2025

To: Health and Human Services Committee, House of Representatives Rhode Island

I would like to thank you for the opportunity to provide testimony Tuesday April 1, 2025, in Bill H5621. By way of brief introduction, my name is Linda Hurley, and I am the President and CEO of Codac Healthcare. Codac Healthcare is Rhode Island's oldest, largest, and non-profit provider of outpatient substance use disorder (SUD) with a specialty in treating opioid use disorder (OUD), treatment, and recovery services. With seven community-based locations, as well as an opioid treatment program collocated inside the Rhode Island Department of Corrections (DOC), Codac is well positioned to deliver services wherever they are need across the state.

Bill H5621

A health insurance bill to establish a rate floor for behavioral health in RI that is no less than the Medicaid rate for any service at the time of the provision of that service. This rate floor would apply to all third-party payers - commercial, private, public, etc.

In March of 2024 this bill was submitted. However, it was submitted to apply to both behavioral health and medical services. We were informed by those reviewing the bill that it was far too complex in the current form in March of 2024. An example of this is complex medical codes from Medicaid and other third-party payers were not consistent with each other. A code for an assessment may be the same number, however the definition could include different services. And that kind of complexity was rampant when comparing medical compensation rates. This is not the case however for behavioral healthcare. Behavioral healthcare codes are consistently defined between Medicaid, Medicare and all third-party payers.

We are requesting an addendum to the February 2025 bill, H5621, to have the rate floor no less than the Medicaid rate for all third-party payers applied to behavioral health only. Our hope is that it will eventually also apply to the medical field, however it will be detrimental to RI residents and the providers of behavioral healthcare for those residents to wait until the medical piece is reconciled. So again, we are supporting the rate floor of the Medicaid rate for behavioral healthcare.

I'm attaching supporting documentation. The documentation compares Medicaid rates to the rates paid by Optum, Tufts, and BCBS. The difference is anywhere from 7% below the Medicaid rate to 102% below Medicaid rates. I believe the concern and its important resolution is self-explanatory. The history of compensation in RI for behavioral healthcare, in particular substance use, and opioid use disorders has been abysmal. We had not had an increase in 20 years until October 1, 2024. The Office of Healthcare Insurance Commission (OHIC) had evaluated compensation rates for behavioral health and determined that opioid treatment rates were 62.4% below what was needed to

provide the service for opioid use disorder. The 62.4% increase was approved in the Rhode Island House and Senate, was approved in the Governor's budget and signed into effect effective October 1, 2024. We are astoundingly grateful and now in April we are starting to feel some relief. We cannot, however, continue to accept rates lower than the Medicaid rate as it has been determined clearly that that is the rate that compensates us for the work provided. There are precedents in other states including Massachusetts for a rate floor bill equal to Medicaid rate. There are also precedents in RI for specific medical conditions. Again, I believe the necessity of having reimbursement rates cover the cost-of-service provision is self-explanatory. We would greatly appreciate you amending this bill and moving it forward.

With great respect and gratitude,

Linda Hurley

CPT Code	Definition	License	Rt Medicaid	BCBSRI	Optum	Point32
90792	Psychiatric Diagnostic Evaluation with Medical Services	MD	370.89	297.41	210.51	208.35
		Nurses	227.57		178.93	208.35
90834	Psychotherapy, 45 Min	Masters	80.51		80.30	
		Nurses	93.58		91.00	
90846	Family Psychotherapy, without pt present	MD	128.82	116.68	125.96	105.79
		Masters	89.46	87.51		
		Nurses	128.82	99.18	107.07	105.79
90847	Family Psychotherapy, with pt present	MD	120.90			110.30
		Nurses	128.82	103.94	111.39	110.30
90853	Group Psychotherapy	MD	60.45	48.94	40.80	30.18
		Masters	37.34	36.71		30.18
		Nurses	60.45	41.60	40.80	30.18
99215	Office or other outpatient visit for the evaluation and management of an established patient, which requires a medically appropriate history and/or examination and high level of medical decision making. When using time for code selection, 40-54 minutes of total time is spent on the date of the encounter	MD	206.05	195.84	192.72	194.72
H0020	Methadone Dosing - Bundled Medicaid		137.97			11.43*

* = Note Point32 pays a daily rate of \$11.43 and one could bill separately a therapy session – this is unbundled unlike the other 2 Key payers in the state - \$80.01 equates to weekly rate